

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Hubertus Cornelis Heule  
C. Monte Calahonda 22  
Mijas, Spain 29649  
Plaintiff,

2:25-cv-7318-DCN-MGB

v.

Peters & May USA Inc.  
750 W. Sunrise Blvd  
Fort Lauderdale, FL 33311

Compass Marine (brand of Peters & May)  
750 W. Sunrise Blvd  
Fort Lauderdale, FL 33311

Chad Beckmann  
2006 Cherry Hill Lane  
Charleston, SC 29405

Kristina Drost  
2006 Cherry Hill Lane  
Charleston, SC 29405  
(also affiliated with Akira Technologies, Washington, D.C.)

MSC USA Inc.  
700 Watermark Blvd  
Mount Pleasant, SC 29464

Defendants.

Civil Action No. \_\_\_\_\_

CIVIL FRAUD COMPLAINT  
(FRAUD, BREACH OF CONTRACT, CONVERSION)  
DEMAND FOR JURY TRIAL

INTRODUCTION

1. Plaintiff Hubertus Cornelis Heule and his wife are retired consumers of advanced age who entrusted Defendants as professional shipping and logistics providers to handle the secure international transport of their personal and irreplaceable property. Instead, Defendants committed acts of fraud and deception that caused devastating financial and emotional harm, taking advantage of Plaintiff's status as a private consumer unfamiliar with complex shipping regulations and industry practices.

2. This is a civil action seeking damages for fraud, breach of contract, and conversion arising out of a transatlantic shipping transaction that resulted in the theft or misappropriation of Plaintiff's entire container of household goods, museum-quality artwork, three luxury automobiles, antiques, heirlooms, and other irreplaceable property valued at over €3 million.

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3. The Plaintiff, Hubertus Cornelis Heule, relied in good faith on the Defendants to securely ship and deliver these goods from Charleston, South Carolina, to Valencia, Spain. Instead, Defendants generated false and unsigned Bills of Lading, intentionally misdirected the shipment, and refused to release or recover the Plaintiff's property without unlawful extortion.

4. As a result, the Plaintiff and his wife have been left emotionally devastated and financially ruined, arriving in Spain with only one suitcase and no recourse until now.

#### JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction pursuant to 28 U.S. Code § 1332(a)(2) (diversity jurisdiction) as Plaintiff is a citizen of Spain and the Defendants are citizens of the United States. The amount in controversy exceeds \$75,000.

6. Venue is proper in this District under 28 U.S. Code § 1391(b)(2) as a substantial part of the events or omissions giving rise to the claim occurred in South Carolina, including the misrepresentation, shipment, and fraudulent documentation.

#### PARTIES

7. Plaintiff Hubertus Cornelis Heule is a 69-year-old retired professional currently residing in Spain.

8. Defendant Peters & May USA Inc. is a Florida-based logistics company involved in international boat and freight shipping.

9. Defendant Compass Marine is a brand operated by Peters & May USA Inc. and issued the fraudulent shipping documents.

10. Defendant Chad Beckmann acted as Export Manager for Compass Marine and was the Plaintiff's primary contact throughout the transaction.

11. Defendant Kristina Drost was also involved in document processing and billing and continued to send correspondence from Peters & May USA through 2022.

12. Defendant MSC USA Inc. acted as the ocean carrier and issued conflicting and inaccurate Bills of Lading in coordination with Compass Marine.

#### FACTUAL ALLEGATIONS

13. In 2021, Plaintiff arranged international shipping of his goods via Compass Marine (Peters & May USA). All items were packed and prepared in a container by Royal Marine Packing, Charleston, SC.

14. The move included three cars (a Dodge Viper, a classic Chevrolet, and a luxury SUV), more than 100 original artworks, antique Persian tapestries, Chinese porcelain, and personal heirlooms.

15. Plaintiff paid all fees upfront. He was initially quoted for delivery to Antwerp but confirmed in writing the change to Valencia, Spain, well before departure on November 23, 2021.

16. Compass Marine generated two unsigned Bills of Lading with different destinations, seal numbers, and inconsistencies. One falsely stated Antwerp as the destination after the container had already left port for Valencia.

17. Upon arrival in Spain, Plaintiff was told the container could not be released without paying an additional €60,000. Plaintiff refused this unlawful demand.

18. Since then, Defendants have refused to release, locate, or explain the whereabouts of the container. Plaintiff contacted U.S. Customs and Charleston Police, who confirmed the container left Charleston on November 25 and was offloaded in Antwerp. Its contents are now missing.

19. MSC failed to require proper signatures or confirm the destination change, despite internal documentation showing Valencia as the port of discharge.

20. Plaintiff has since confirmed that none of the shipping documents were ever signed by the carrier, Compass Marine, or MSC, a violation of shipping protocols.

21. As of today, the Plaintiff's entire shipment remains missing, and Defendants have refused to cooperate or accept liability.

#### CAUSES OF ACTION

##### Count I – Fraud

22. Defendants knowingly created and used fraudulent, unsigned shipping documents to mislead the Plaintiff and misdirect the shipment.

23. Defendants falsely claimed the Plaintiff had requested shipment to Antwerp, which is provably false based on pre-departure documentation.

##### Count II – Breach of Contract

24. Plaintiff paid all agreed shipping fees in advance. Defendants failed to fulfill the contracted delivery to Valencia and violated key terms.

25. Compass Marine and MSC failed to provide valid, signed Bills of Lading and to ensure safe delivery.

##### Count III – Conversion

26. Defendants have wrongfully retained or caused the loss of Plaintiff's property, with no legal justification, and refused to return or account for it.

27. The retention and/or disappearance of these goods constitutes unlawful conversion.

#### DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

A. Award compensatory damages in excess of \$3,000,000;

B. Award punitive damages for fraud and bad faith;

C. Award costs, legal fees, and other appropriate relief;

D. Grant such further relief as the Court deems just and proper;

E. Award compensation for Plaintiff's severe emotional distress, financial losses, and harm caused by Defendants' fraudulent and malicious conduct, particularly given Plaintiff's status as an elderly, retired consumer.

Respectfully submitted,

DATED: July 1, 2025

/s/ Hubertus Cornelis Heule  
Hubertus Cornelis Heule  
C. Monte Calahonda 22  
Mijas, Spain 29649  
Email: HeuleHugo@gmail.com  
Plaintiff, pro se

A handwritten signature in black ink, consisting of a large, stylized 'H' with a vertical line extending downwards and a horizontal line extending to the right, ending in a small loop.

**UNITED STATES DISTRICT COURT**  
District of South Carolina

**I. (a) PLAINTIFFS**

Hubertus Cornelis Heule  
C. Monte Calahonda 22, Mijas, Spain 29649

**(b) DEFENDANTS**

- Peters & May USA Inc. (Fort Lauderdale, FL)
- Compass Marine (Fort Lauderdale, FL)
- Chad Beckmann (Charleston, SC)
- Kristina Drost (Charleston, SC / Akira-Tech, Washington, D.C.)
- MSC USA Inc. (Mount Pleasant, SC)

**(c) Attorneys**

Pro Se Plaintiff: Hubertus Cornelis Heule  
C. Monte Calahonda 22, Mijas, Spain 29649  
Email: HeuleHugo@gmail.com

**II. BASIS OF JURISDICTION**

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Gov't Not a Party)  
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**

	Plaintiff	Defendant
Citizen of This State (SC)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Citizen of Another State	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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C. Award costs, legal fees, and other appropriate relief;

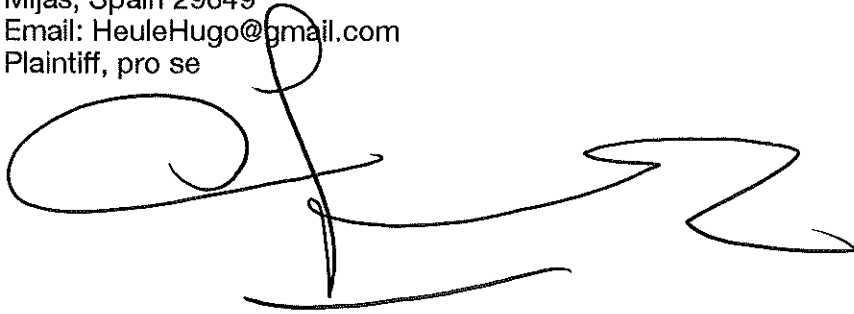
D. Grant such further relief as the Court deems just and proper;

E. Award compensation for Plaintiff's severe emotional distress, financial losses, and harm caused by Defendants' fraudulent and malicious conduct, particularly given Plaintiff's status as an elderly, retired consumer.

Respectfully submitted,

DATED: July 1, 2025

/s/ Hubertus Cornelis Heule  
Hubertus Cornelis Heule  
C. Monte Calahonda 22  
Mijas, Spain 29649  
Email: HeuleHugo@gmail.com  
Plaintiff, pro se

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**IV. NATURE OF SUIT**

- ☒ 370 Other Fraud  
☐ 190 Other Contract  
☐ 380 Other Personal Property Damage

Other Statutory Actions:

Fraud, Breach of Contract, and Conversion relating to transatlantic shipment and fraudulent Bills of Lading.

**V. ORIGIN**

- ☒ 1 Original Proceeding

**VI. CAUSE OF ACTION**

Breach of Contract, Fraud, and Conversion relating to international shipping, based on unsigned/ fraudulent Bills of Lading and refusal to deliver container of goods.

28 U.S.C. § 1332(a)(2) (Diversity jurisdiction)

**VII. REQUESTED IN COMPLAINT**

- ☐ Class Action  
☒ DEMAND \$3,000,000+ in damages  
☒ JURY DEMAND: Yes

**VIII. RELATED CASE(S)**

None

DATE: July 1, 2025

**SIGNATURE OF ATTORNEY OF RECORD:**

/s/ Hubertus Cornelis Heule (Pro Se)

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# AO 239 – Application to Proceed In District Court Without Prepaying Fees or Costs (Long Form)

## UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

**Plaintiff:** Hubertus Cornelis Heule

**Defendants:** Peters & May USA Inc., Compass Marine, Chad Beckmann, Kristina Drost, MSC USA Inc.

**Case Number:** (To be filled by the Court)

### I. Personal Information

1. **Full Name:** Hubertus Cornelis Heule
2. **Address:** C. Monte Calahonda 22, Mijas, Spain 29649
3. **Age:** 69
4. **Marital Status:** Married
5. **Name of Spouse:** Yvonne Alice Maria Hinfelaar
6. **Dependents:** None

### II. Employment Information

7. **Employment Status:** Not currently employed
8. **Spouse's Employment:** Not employed

### III. Income

9. **Monthly income (self):**

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- U.S. Retirement: €1,300
- Belgian Pension: €673
- Dutch Pension: €561
- **Total:** €2,534/month (approx. \$2,700 USD depending on exchange rate)

**10. Spouse's Income:** None

## **IV. Assets**

- 11. Property:** Own house in Spain, valued approx. €350,000 (no mortgage)
- 12. Vehicles:** 2016 Mini Cooper
- 13. Savings:** €6,000 in bank savings account
- 14. Loan:** €15,000 owed to a friend in the U.S. at 5% interest

## **V. Monthly Expenses**

- 15. Utilities:** €500/month
- 16. Food:** €1,100/month
- 17. Transportation:** €300/month
- 18. Phone/Internet:** €150/month
- 19. Miscellaneous:** €250/month
- 20. Health Insurance:** €271/month
- 21. Home Insurance:** €760/year

## **VI. Other Information**

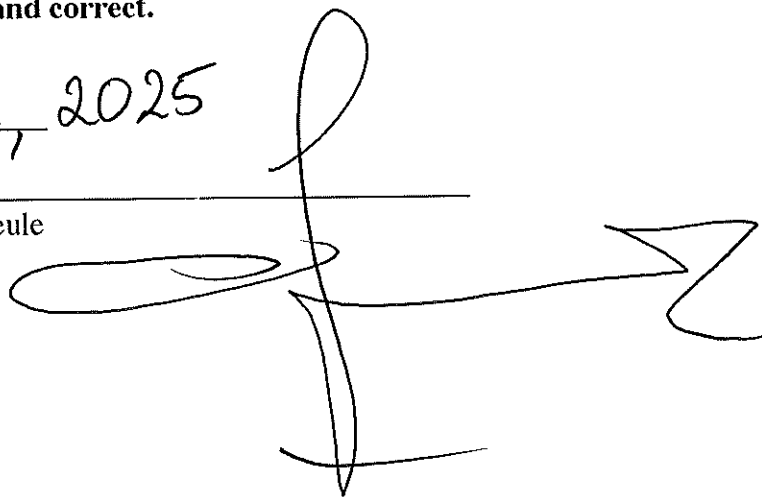
- 22. Other sources of income or support:** None
- 23. Statement of hardship:** Plaintiff cannot afford the court filing fee without hardship.

I believe I am unable to pay the costs of these proceedings, and I request permission to proceed without prepayment of fees. I declare under penalty of perjury that the foregoing information is true and correct.

Date: July 1, 2025

Signature: \_\_\_\_\_

Hubertus Cornelis Heule

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